

### **Remarks**

In the application, claims 1 through 20 are currently pending. No claims have been allowed.

The non-final Office Action dated March 7, 2008, has been carefully considered. The specification is objected to as containing extraneous text on the page of the Abstract. Claims 1, 3 through 5, 8 through 13, and 15 through 20 are rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent 7,333,510 (“Hies”). Claims 2, 6, 7, and 14 are rejected under 35 U.S.C. § 103(a) as obvious in light of Hies and U.S. Patent 7,231,452 (“Ananda”).

### **Amendments to the Specification**

The extraneous text is deleted from the page of the Abstract.

### **Amendments to the Claims**

A typographical error is corrected in claim 17. No new matter is introduced by this amendment.

### **The § 102(e) and § 103(a) Rejections**

The Applicant respectfully submits that the cited art, either separately or in combination, does not show all of the elements of the pending claims.

Hies performs protocol translation for devices operating on networks of different types. In Figure 2 of Hies, for example, the NAT-PT (206) translates between IPv4 networks (205 and 205) and an IPv6 network (202). However, Hies does not discuss the multicast addressing recited in all currently pending independent claims. In fact, the exemplary addresses used in Hies are all unicast. The difference between multicast addressing and unicast addressing is so significant that Hies would not work in the scenarios described in the present application. As a first example, the distinction between unicast and multicast is reflected in the network architecture. The Hies translator must sit between the networks for which it is translating, while a translator made according to the present invention can listen in on multicast messages from multiple networks.

The unicast vs. multicast distinction also shows up in the internal architecture of the translators. In Hies, each network interface only supports one type of protocol. In the present invention, on the other hand, a network interface can support multiple protocol types. This is reflected in the dual-protocol stack recited in claims 9 and 17. Because of Hies' limitation to unicast addressing, it neither needs nor teaches a dual-stack.

The use of multicast addressing makes all of the currently pending claims patentable over the cited art.

As another distinction, in all pending independent claims, translation can be triggered by noting a lack of response to a message after a certain time period has elapsed. The Hies translator is limited because it only translates a message when explicitly told to do so by information in a message header.

As an optional element of the present invention, pending claims 5, 6, and 12 recite an aliased network interface. The prior art does not discuss this.

For these and other reasons, the cited art neither anticipates nor renders obvious the currently pending independent claims. The pending dependent claims include by reference all of the limitations of their antecedent independent claims and so are patentable over the cited art for at least the same reasons as given above.

### **Conclusion**

This application is considered to be in good and proper form for allowance, and the Applicant requests that the Examiner pass this application on to issue. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of this application, the Examiner is invited to call the Applicant's representative at the number given below.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,

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